

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Case No. 1:18-CR-00390(3)-RP
	§	
Laurentino Reyes-Gomez	§	

UNOPPOSED MOTION FOR CONTINUANCE

TO THE COURT:

NOW COMES Laurentino Reyes-Gomez, Defendant in the above-referenced cause who, by and through his undersigned attorney, and moves for a continuance of the motions deadline and trial date in the above cause for the following reasons:

I.

Defendant's attorney has has been diligently working and negotiating with the United States Assistant Attorney. There is some indication that additional work on the case is necessary between the parties to resolve this matter, perhaps without the necessity of trial. In the interest of judicial resources, Defendant respectfully requests an unopposed continuance to permit this process to continue.

II.

Counsel is requesting that the motions deadline be extended to anytime after May 25, 2019 and the trial date be continued until 60 days after the motions deadline.

III.

This matter is currently set for Jury Selection/Trial on April 1, 2019 at 9:00 a.m., with docket call set for March 25, 2019 at 9:00 a.m.

IV.

Defense counsel has conferred with both the Assistant United States Attorney and his co-defense counsel. All parties have indicated that they are not opposed to this motion.

V.

This motion is not made for the purpose of delay, but only that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court grant this motion and for such other relief to which Defendant shows himself entitled.

Respectfully submitted,

R. SCOTT MAGEE,
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By: /s/ R. Scott Magee
R. Scott Magee
Texas State Bar No. 24010204

ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

By my signature below, I do hereby certify that on March 11, 2019, I conferred with Assistant United States Attorney, Gabriel Cohen, and my fellow co-counsel regarding this motion for continuance and they advised that they are unopposed to this motion.

/s/ R. Scott Magee
R. Scott Magee

CERTIFICATE OF SERVICE

By my signature below, I do hereby certify that a true and correct copy of the above and foregoing instrument was served on all known filing users by electronic mail via CM/ECF on March 11, 2019.

Notice has been electronically mailed to:

Gabriel Cohen
Oscar Buitron
Jon Evans

/s/ R. Scott Magee
R. Scott Magee